

RMT/AAS:JEA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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20-403 M

UNITED STATES OF AMERICA

- against -

COLINFORD MATTIS and  
UROOJ RAHMAN,

Defendants.

COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF APPLICATION FOR  
ARREST WARRANTS

(18 U.S.C. §§ 844(i), 2)

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EASTERN DISTRICT OF NEW YORK, SS:

KYLE JOHNSON, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

Causing Damage by Fire and Explosives – Police Vehicle

On or about May 30, 2020, within the Eastern District of New York, the defendants COLINFORD MATTIS and UROOJ RAHMAN did knowingly, intentionally and maliciously damage, and attempt to damage and destroy, by means of fire and one or more explosives, a vehicle and other real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a New York City Police Department vehicle in Brooklyn, New York.

(Title 18, United States Code, Sections 844(i), 2)

The source of your deponent's information and the grounds for his/her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Joint Terrorism Task Force ("JTTF"). I have been an agent for approximately four years. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical and electronic surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information regarding a variety of crimes. I am familiar with the facts and circumstances set forth below from my personal review of records, documents and other physical evidence obtained during this investigation, and from communications and information provided to me by fellow agents and other government personnel with knowledge related to this investigation.

2. On or about May 30, 2020 at approximately 12:57 a.m., an individual, later identified as the defendant UROOJ RAHMAN, exited a tan minivan and approached a New York City Police Department ("NYPD") vehicle parked in the vicinity of the NYPD's 88th Precinct located in Fort Greene, Brooklyn. Video surveillance from the NYPD's 88th Precinct captured the events. After the defendant RAHMAN approached the NYPD vehicle, she lit and threw an incendiary device, comprised of a bottle containing an incendiary chemical (sometimes referred to as a "Molotov cocktail" device) into the NYPD

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


vehicle through a previously broken window, which set fire to the console of the NYPD vehicle. The defendant RAHMAN then returned to the tan minivan, which fled the scene.

3. Law enforcement observed the defendant RAHMAN throw the Molotov cocktail into the NYPD vehicle and followed the tan minivan during its attempt to flee. Shortly thereafter, an NYPD patrol vehicle stopped the tan minivan, later identified as a tan 2015 Chrysler Town and Country minivan with New York license plate JMU 7197, in the vicinity of 200 Willoughby Avenue. NYPD officers thereafter placed the driver, defendant COLINFORD MATTIS and the passenger, defendant RAHMAN, under arrest. During the arrest, officers observed in plain view several precursor items to build a Molotov cocktail, including a lighter, a bottle filled with toilet paper and a liquid suspected to be gasoline in the vicinity of the passenger seat and a gasoline tank in the rear of the vehicle.

4. A review of law enforcement databases shows that the defendant MATTIS is the registered owner of the tan 2015 Chrysler Town and Country minivan.

5. The NYPD vehicle is the property of the NYPD and the New York City government. Both the NYPD and New York City government conduct business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the NYPD and the New York City government in enacting and enforcing laws also affect interstate commerce.

WHEREFORE, your deponent respectfully requests that the defendant COLINFORD MATTIS and UROOJ RAHMAN, be dealt with according to law.

  
KYLE JOHNSON  
Special Agent, Federal Bureau of Investigation

Sworn to before me this  
30th day of May, 2020

SWORN VIA TELEPHONE

  
THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK